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The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NATIONAL PRODUCTS, INC.,

Case No. 2:12-cv-01865

Plaintiff,

v.

LIFEDGE LTD. and SCANSTRUT LTD.,

Defendants.

STIPULATED MOTION AND ORDER REQUESTING RELIEF FROM DEADLINE TO FILE JOINT SUBMISSION OF POTENTIAL TECHNICAL ADVISORS

Note On Motion Calendar: April 15, 2013

Plaintiff National Products, Inc. ("NPI") and Defendants Lifedge Ltd. and Scanstrut Ltd. (collectively, "Defendants") respectfully stipulate and move for relief from the Court's April 22, 2013 deadline for the parties to jointly submit the resumes of three qualified individuals who are willing to serve as a technical advisor in this matter. *See* Dkt. No. 20, Minute Order Setting Trial Date & Related Dates.

The parties believe that a technical advisor is unnecessary. The technology covered by the patent asserted in this action is uncomplicated and should not be difficult for the Court to understand. U.S. Patent No. 7,495,895 ("the '895 patent") is generally directed to a protective cover for a touch sensitive device, such as an iPad. *See* Dkt. No. 1, Ex. A. This is a purely mechanical invention, and the parties agree that no specialized technical expertise

(i.e., knowledge of engineering, chemistry, or other scientific subject) is required for the 1 Court to understand the single claim asserted by NPI in this patent infringement lawsuit. In 2 addition, locating three neutral technical experts in this field will be difficult and expensive. 3 For these reasons, NPI and Defendants respectfully request that the Court relieve the 4 5 parties from the April 22, 2013 deadline to jointly submit potential technical advisors. 6 RESPECTFULLY SUBMITTED this 15th day of April, 2013. 7 8 9 10 By: s/Ewa M. Davison By: s/Gina Vogel Culbert David K. Tellekson, WSBA No. 33523 Gina Vogel Culbert, WSBA No. 30213 11 Allison S. Wallin, WSBA No. 24285 Ewa M. Davison, WSBA No. 39524 Jeffrey A. Ware, WSBA No. 43779 Columbia Center 12 1191 Second Avenue, 10th Floor 701 Fifth Avenue, Suite 4100 Seattle, Washington 98101 Seattle, Washington 98104 13 Phone: 206-389-4510 Phone: 206-342-6259 14 Fax: 206-389-4511 Fax: 206-342-6201 Email: dtellekson@fenwick.com Email: rculbert@merchantgould.com 15 awallin@merchantgould.com edavison@fenwick.com jware@fenwick.com 16 Attorneys for Defendants 17 Attorneys for Plaintiff Lifedge Ltd. and Scanstrut Ltd. National Products, Inc. 18 19 20 21 22 23 24 25 26

1	ORDER
2	Based on the foregoing, IT IS SO ORDERED.
3	Dated this 23rd day of April, 2013.
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